

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

DONNA JOHNSON, MARIE WOSKOLUB,  
and ANTONIO BOWSER

Plaintiffs,  
vs.

LEVY LAW, LLC and BART E. LEVY,  
Defendants.

CIVIL ACTION  
No. 20-4469

**REQUEST FOR ENTRY OF DEFAULT JUDGEMENT**

By and through the undersigned counsel, Plaintiffs hereby request the Clerk to enter a default against Defendants, LevyLaw LLC and Bart E. Levy, on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure.

The complaint for this matter was filed herein on September 11, 2020 (See Exhibit A) and proper service was made on Defendants on November 19, 2020. (See Exhibit B).

More than twenty one (21) days have elapsed since Defendants were served, and Defendants have failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure. (See Exhibit A).

Accordingly, Plaintiffs request the Clerk to enter a default against Defendants.

Respectfully submitted,

Dated: January 11, 2020

/s/ Vikram Patel

Vikram Patel, Esq.

Vikram Patel, Esq. (Bar No. 324387)  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 627-7100  
[vpatel@clsphila.org](mailto:vpatel@clsphila.org)

Laura Smith, Esq. (Bar No. 322470)  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 981-3741  
[lsmith@clsphila.org](mailto:lsmith@clsphila.org)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

SECHANCIA SHAW, DONNA JOHNSON,  
MARIE WOSKOLUB, and  
ANTONIO BOWSER

Plaintiffs,  
vs.

LEVYLAW, LLC and BART E. LEVY,  
Defendants.

CIVIL ACTION  
No. 20-4469

**EXHIBITS IN SUPPORT OF PLAINTIFFS REQUEST FOR ENTRY OF DEFAULT  
JUDGEMENT**

- Exhibit A: Docket Report for this matter retrieved from PACER by Vikram Patel on January 11, 2021.
- Exhibit B: Process Receipt and Return from the United States Marshals Service for this matter.

# Exhibit A

**ELARB,STANDARD**

**United States District Court  
Eastern District of Pennsylvania (Philadelphia)  
CIVIL DOCKET FOR CASE #: 2:20-cv-04469-RBS**

SHAW et al v. LEVY LAW, LLC et al  
Assigned to: HONORABLE R. BARCLAY SURRICK  
Cause: 15:1692 Fair Debt Collection Act

Date Filed: 09/11/2020  
Jury Demand: Plaintiff  
Nature of Suit: 480 Other Statutes:  
Consumer Credit  
Jurisdiction: Federal Question

**Plaintiff**

**SECHANCIA SHAW**

represented by **VIKRAM A. PATEL**  
COMMUNITY LEGAL SERVICES  
1424 CHESTNUT STREET  
PHILADELPHIA, PA 19102  
215-687-4621  
Fax: 215-981-0434  
Email: VPatel@clsphila.org  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**LAURA R. SMITH**  
COMMUNITY LEGAL SERVICES OF  
PHILA  
1424 CHESTNUT ST  
PHILADELPHIA, PA 19102  
215-981-3700  
Email: lsmith@clsphila.org  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**DONNA JOHNSON**

represented by **VIKRAM A. PATEL**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**LAURA R. SMITH**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**MARIE WOSKOLUB**

represented by **VIKRAM A. PATEL**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**LAURA R. SMITH**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**ANTONIO BOWSER**

represented by **VIKRAM A. PATEL**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**LAURA R. SMITH**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**LEVYLAW, LLC**

**Defendant**

**BART E. LEVY**

Date Filed	#	Docket Text
09/11/2020	<a href="#">1</a>	COMPLAINT against All Defendants, filed by SECHANCIA SHAW, DONNA JOHNSON, MARIE WOSKOLUB, ANTONIO BOWSER. (Attachments: # <a href="#">1</a> Exhibit, # <a href="#">2</a> Case Management Track Form, # <a href="#">3</a> Designation Form)(PATEL, VIKRAM) (Additional attachment(s) added on 9/14/2020: # <a href="#">4</a> Civil Cover Sheet) (lisad, ). (Entered: 09/11/2020)
09/11/2020	<a href="#">2</a>	MOTION for Leave to Proceed in forma pauperis filed by ANTONIO BOWSER.. (PATEL, VIKRAM) (Entered: 09/11/2020)
09/11/2020	<a href="#">3</a>	MOTION for Leave to Proceed in forma pauperis filed by DONNA JOHNSON.. (PATEL, VIKRAM) Modified on 9/14/2020 (lisad, ). (Entered: 09/11/2020)
09/11/2020	<a href="#">4</a>	MOTION for Leave to Proceed in forma pauperis filed by DONNA JOHNSON.. (PATEL, VIKRAM) *DUPLICATE FILING OF DOC. <a href="#">3</a> * Modified on 9/14/2020 (lisad, ). (Entered: 09/11/2020)
09/11/2020	<a href="#">5</a>	MOTION for Leave to Proceed in forma pauperis filed by SECHANCIA SHAW.. (PATEL, VIKRAM) (Entered: 09/11/2020)
09/11/2020	<a href="#">6</a>	MOTION for Leave to Proceed in forma pauperis filed by MARIE WOSKOLUB.. (PATEL, VIKRAM) (Entered: 09/11/2020)
09/11/2020		DEMAND for Trial by Jury by ANTONIO BOWSER, DONNA JOHNSON, SECHANCIA SHAW, MARIE WOSKOLUB. (lisad, ) (Entered: 09/14/2020)
09/11/2020		Case Eligible for Arbitration(lisad, ) (Entered: 09/14/2020)

09/25/2020	<a href="#">7</a>	NOTICE of Appearance by LAURA R. SMITH on behalf of ANTONIO BOWSER, DONNA JOHNSON, SECHANCIA SHAW, MARIE WOSKOLUB (SMITH, LAURA) (Entered: 09/25/2020)
10/06/2020	<a href="#">8</a>	ORDERED AS FOLLOWS: PLAINTIFFS ARE GRANTED LEAVE TO PROCEED IN FORMA PAUPERIS. THE COMPLAINT IS TO BE FILED AND SUMMONS IS TO BE ISSUED. THE UNITED STATES MARSHALL FOR THE EASTERN DISTRICT OF PENNSYLVANIA SHALL SERVE THE SUMMONS AND COMPLAINT UPON THE DEFENDANTS AT NO COST TO PLAINTIFFS.. SIGNED BY HONORABLE R. BARCLAY SURREICK ON 10/6/2020.10/6/2020 ENTERED AND COPIES E-MAILED.(sg, ) (Entered: 10/06/2020)
10/06/2020		Summons Issued as to BART E. LEVY, LEVY LAW, LLC. Forwarded To: EMAILED TO US MARSHAL on 10/6/2020 (sg, ) (Entered: 10/06/2020)
10/15/2020	<a href="#">9</a>	Status Report on Request for USM 285 Form (sg, ) (Entered: 10/15/2020)
10/21/2020	<a href="#">10</a>	CERTIFICATE OF SERVICE by ANTONIO BOWSER, DONNA JOHNSON, SECHANCIA SHAW, MARIE WOSKOLUB re <a href="#">7</a> Notice of Appearance (SMITH, LAURA) (Entered: 10/21/2020)
11/19/2020	<a href="#">11</a>	SUMMONS Returned Executed by SECHANCIA SHAW, DONNA JOHNSON, MARIE WOSKOLUB, ANTONIO BOWSER re: US MARSHAL served Summons and Complaint upon BART E. LEVY, LEVY LAW, LLC by PERSONAL SERVICE. BART E. LEVY served on 11/19/2020, answer due 12/10/2020; LEVY LAW, LLC served on 11/19/2020, answer due 12/10/2020. (sg, ) (Entered: 11/19/2020)

PACER Service Center			
Transaction Receipt			
01/11/2021 12:55:30			
PACER Login:	vikpatel:6523621:0	Client Code:	
Description:	Docket Report	Search Criteria:	2:20-cv-04469-RBS
Billable Pages:	2	Cost:	0.20

# Exhibit B

U.S. Department of Justice  
United States Marshals Service

## PROCESS RECEIPT AND RETURN

See Instructions for Service of Process by U.S. Marshal

PLAINTIFF	COURT CASE NUMBER
Sechancia Shaw et al	20-4469
DEFENDANT	TYPE OF PROCESS
Bart Levy et al	SIC
NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN	
SERVE AT { LEVYLAWS, LLC	
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code) 1515 MARKET STREET, SUITE 950, PHILADELPHIA, PA 19102	

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW	Number of process to be served with this Form 285
Vikram Patel 1424 Chestnut St Philadelphia, PA 19102	1
	Number of parties to be served in this case
	2
	Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Levy Law Office Phone Number: (267) 687-8000

Signature of Attorney other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF	TELEPHONE NUMBER	DATE
	<input type="checkbox"/> DEFENDANT	215-687-4621	11/3/20

### SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date
	1	64	66	M. Levy	11/5/2020

I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the individual, company, corporation, etc. shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	Date	Time	AM
Bart Levy	11/19/20	9:10	<input checked="" type="checkbox"/> am
<input type="checkbox"/> pm			

Address (complete only different than shown above)	Signature of U.S. Marshal or Deputy
	M. Levy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)

### REMARKS

UNITED RECEIVED  
STATES DISTRICT  
2020 NOV -5 AM 7:25  
EASTERN DISTRICT OF  
PENNSYLVANIA

U.S. Department of Justice  
United States Marshals Service

## PROCESS RECEIPT AND RETURN

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF	COURT CASE NUMBER
Sechancia Shaw et al	20-4469
DEFENDANT	TYPE OF PROCESS
Bart Levy et al	SJC
NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN	
SERVE	Bart Levy
AT	ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code) 1515 MARKET STREET, SUITE 950, PHILADELPHIA, PA 19102

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW	Number of process to be served with this Form 285
Vikram Patel 1424 Chestnut St Philadelphia, PA 19102	1
	Number of parties to be served in this case
	2
	Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Bart Levy Office Phone Number: (267) 687-8000

Signature of Attorney other Originator requesting service on behalf of	<input checked="" type="checkbox"/> PLAINTIFF	TELEPHONE NUMBER	DATE
	<input type="checkbox"/> DEFENDANT	215-687-4621	11/3/20

### SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date
	1	66	66		11/5/2020

I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the individual, company, corporation, etc. shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	Date	Time	am
	11/19/20	9:10	<input checked="" type="checkbox"/>
Address (complete only different than shown above)	<input type="checkbox"/> pm		

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
130.00	4.8 R/T x 2		132.76		

### REMARKS

11/12/20 1<sup>st</sup> Endeavor Bart Levy/Levy, Law no longer practice out of 1515 Market St. New office is 1500 Market St. (Regus Group) 12<sup>th</sup> Fl. Left contact to call when Levy returns.

11/19/20 Served to Bart Levy at 1500 Market St. Philadelphia PA

RECEIVED  
UNITED STATES MARSHAL  
2020 NOV -5 AM 7:25  
EASTERN DISTRICT OF  
PENNSYLVANIA